

# **EXHIBIT D**

**From:** [Geman, Rachel](#)  
**To:** [Burgoon, Emma Z.](#)  
**Cc:** [OpenAICopyright](#); [#C-M.OPENAI.COPYRIGHT.LITIGATION - LW TEAM](#); [KVP-OAI](#); [ahurst@orrick.com](#); [jared.briant@faegredrinker.com](#); [lnajemy@orrick.com](#); [ccariello@orrick.com](#); [djustice@orrick.com](#)  
**Subject:** Re: [EXT] Authors Guild - Maya Lang  
**Date:** Tuesday, June 11, 2024 9:59:00 AM  
**Attachments:** [image001.png](#)

---

We do not agree to absent class member discovery.  
Sent from my iPhone

On Jun 11, 2024, at 11:40 AM, Burgoon, Emma Z. <[EBurgoon@mofo.com](mailto:EBurgoon@mofo.com)> wrote:

Rachel,

OpenAI does not oppose the withdrawal of Maya Lang as a named plaintiff, so long as you agree that her withdrawal will not affect our ability to obtain discovery from her.

Thanks,

Emma

Emma Z. Burgoon (she/her/hers)  
Associate  
[EBurgoon@mofo.com](mailto:EBurgoon@mofo.com)<<mailto:EBurgoon@mofo.com>>  
T +1 (213) 892-5462  
M +1 (213) 585-8668

<[image001.png](#)>

---

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP's Privacy Policy<<https://www.mofo.com/about/privacy-policy.html>>.

This message is intended for the named recipients only. It may contain information protected by the attorney-client or work-product privilege. If you have received this email in error, please notify the sender immediately by replying to this email. Please do not disclose this message to anyone and delete the message and any attachments. Thank you.